

Decision 04-04-012 April 1, 2004

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of PACIFIC GAS AND ELECTRIC
COMPANY in the 1999 Annual Transition Cost
Proceeding.

Application 99-09-006
(Filed September 1, 1999)

**DECISION AWARDING INTERVENOR COMPENSATION
TO THE SOUTHEAST ALLIANCE FOR ENVIRONMENTAL JUSTICE**

This decision awards the Southeast Alliance for Environmental Justice (SAEJ) \$50,033.72 for its contribution to Decision (D.) 03-10-013. In that decision, the Commission adopted Pacific Gas and Electric Company's (PG&E) estimate of approximately \$65.1 million for the future decommissioning and site remediation of the Hunters Point Power Plant (HPPP).

I. Background

The HPPP is an older PG&E power plant located in the Hunters Point area of San Francisco. Many residents and community groups wish to have the plant removed. They claim the plant has harmed the environment in a low-income community that already has more than its share of pollution sources, from a sewage treatment plant to the former Hunters Point naval shipyard.

In January 1998, PG&E applied to the Commission to sell four fossil-fueled plants, including HPPP.¹ Subsequently, PG&E amended its application to withdraw HPPP from the power plant auction in accordance with an agreement with the City and County of San Francisco (CCSF). Pursuant to this agreement, PG&E agreed to (1) withdraw HPPP from the auction; (2) permanently shut down the plant as soon as it is no longer needed for electric reliability; (3) begin decommissioning the plant and remediating the site within one year of shutting the plant down; and (4) restrict any other party from using the site for purposes of power generation. This agreement made PG&E responsible for non-environmental as well as environmental costs of decommissioning HPPP. The Commission approved the agreement in D.98-10-029.

This proceeding was designed to estimate the costs of decommissioning the plant and cleaning-up the site. SAEJ advocated for a higher cost estimate than PG&E's, reasoning that the site should be cleaned up to a level that would allow for residential development on the site, rather than to a level that would permit future industrial use of the property. SAEJ also alleged that the PG&E estimate was not adequately documented, and asserted that it was premature to adopt an estimate for decommissioning when the activity would not commence for at least five years. SAEJ was concerned that because PG&E's estimate was too low, it would shortchange the needed cleanup, and costs could skyrocket in the future. SAEJ recommended that PG&E's estimate be increased by 25 percent.

The Commission did not adopt all of SAEJ's recommendations. No party opposes SAEJ's request for compensation.

¹ Application (A.) 98-01-008.

II. Requirement for Awards of Compensation

The intervenor compensation program, enacted by the Legislature in Pub. Util. Code §§ 1801-1812, requires that the intervenor satisfy all of the following procedures and criteria to obtain a compensation award:

1. The intervenor must be a customer or a participant representing consumers, customers, or subscribers of a utility subject to our jurisdiction. (§ 1802(b).)
2. The intervenor must satisfy certain procedural requirements including the filing of a sufficient notice of intent (NOI) to claim compensation within 30 days of the prehearing conference (or in special circumstances, at other appropriate times that we specify). (§ 1804(a).)
3. The intervenor must file and serve a request for a compensation award within 60 days of our final order or decision in a hearing or proceeding. (§ 1804(c).)
4. The intervenor must demonstrate significant financial hardship. (§ 1804(b)(1).)
5. The intervenor's presentation must have made a substantial contribution to the proceeding, through the adoption, in whole or in part, of the intervenor's contentions or recommendations by a Commission order or decision. (§ 1803(a).)
6. The claimed fees and costs are comparable to the market rates paid to experts and advocates having comparable training and experience and offering similar services. (§ 1806.)

For discussion here, the procedural issues in Items 1-3 above are combined, followed by separate discussions on Items 4-6.

A. Procedural Issues

SAEJ filed its timely NOI on November 29, 1999. On January 3, 2000, the ALJ made preliminary finding that, subject to SAEJ filing a copy of its articles of incorporation or bylaws within 30 days of the date of the ruling, SAEJ would be eligible to file a claim for intervenor compensation. On January 28, 2000, SAEJ filed its bylaws with the Commission, satisfying the foregoing condition. SAEJ also filed its request for compensation in a timely manner. The Commission issued D.03-10-013 on October 2, 2003, and SAEJ filed its request on November 24, 2003, well within the 60-day deadline.

Thus, SAEJ has satisfied all the procedural requirements necessary to make its request for compensation.

B. Financial Hardship

An intervenor seeking compensation must show that, without undue hardship, it cannot pay the reasonable costs of effective participation in the proceeding. In the case of groups or organizations, significant financial hardship is demonstrated by showing that the economic interest of individual members is small compared to the overall costs of effective participation (§ 1802(g)). Such a finding is normally made in the ALJ's preliminary ruling as to whether the customer will be eligible for compensation (§ 1804(b)).

In its NOI, SAEJ asserted financial hardship. With its submission of its bylaws within 30 days of the date of the ALJ's ruling on SAEJ's NOI, the ALJ's condition set forth in Section A above was met, and it is now presumed that SAEJ meets the financial hardship test.

C. Substantial Contribution

1. Definition of Substantial Contribution

Section 1802(h) states that “substantial contribution” means that, in the judgment of the commission, the customer’s presentation has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer. Where the customer’s participation has resulted in a substantial contribution, even if the decision adopts that customer’s contention or recommendations only in part, the commission may award the customer compensation for all reasonable advocate’s fees, reasonable expert fees, and other reasonable costs incurred by the customer in preparing or presenting that contention or recommendation.

As provided in § 1802(h), a party may make a substantial contribution to a decision in one of several ways. It may offer a factual or legal contention upon which the Commission relies in making a decision, or it may advance a specific policy or procedural recommendation that the ALJ or Commission adopts. A substantial contribution includes evidence or argument that supports part of the decision even if the Commission does not adopt a party’s position in total.

Importantly for purposes of this decision, the Commission has provided compensation even when the position advanced by the intervenor is rejected.²

² *See* D.89-03-063 (awarding San Luis Obispo Mothers For Peace and Rochelle Becker compensation in Diablo Canyon Rate Case because their arguments, while ultimately unsuccessful, forced the utility to thoroughly document the safety issues involved). *See also* D.89-09-103, order modifying D.89-03-063 (in certain exceptional circumstances, the Commission may find that a party has made a substantial contribution in the absence of the adoption of any of its recommendations. Such a liberalized standard should be utilized only in cases where a strong public policy exists to encourage intervenor participation because of factors not present in the usual Commission proceeding. These factors must include 1) an extraordinarily complex proceeding, and 2) a case of unusual importance.

2. SAEJ's Substantial Contribution to D.03-10-013

SAEJ asserts that on three key issues in this case, SAEJ either prevailed outright or made a substantial contribution to their resolution, and that it is therefore entitled to compensation. We discuss each of these issues in turn, and find that SAEJ's contribution was substantial on all issues.

a) The Cost of the Environmental Remediation for the HPPP

SAEJ claims that its advocacy was a major factor in motivating PG&E to raise its estimated cost of cleanup of the site to the amount the Commission subsequently approved. SAEJ asserts it also persuaded the Commission not to adopt the Office of Ratepayer Advocates' (ORA) proposal to adopt PG&E's original, lower estimate. We agree with both claims.

In its original application, PG&E indicated that it planned to dismantle the HPPP site and restore the bulk of the site to an industrial/commercial level. SAEJ countered by advocating cleanup to residential standards, citing the particular environmental justice concerns of the adjacent low-income residential Hunters Point community in Southeast San Francisco.

In its rebuttal testimony, PG&E adopted the point of view that residential standards would likely be required and adjusted its cost estimate accordingly. PG&E highlighted the specific role of SAEJ's environmental justice concerns in its change of position:

PG&E acknowledges the environmental justice implications noted in CCSF's and SAEJ's testimony. PG&E also acknowledges that the Bayview-Hunters Point community has borne the heavy burden of having a disproportionately high number of industrial facilities located there over its history. PG&E Rebuttal Testimony 5-2:6-9.

In our view, SAEJ was instrumental in motivating PG&E to further investigate the costs associated with an increased standard of remediation. In response to SAEJ's (and CCSF's) concerns over the appropriate amount of funds necessary to complete a residential level cleanup, PG&E performed an analysis to estimate the costs to remediate the site to allow future residential uses in the areas previously assumed to remain in industrial use. The results of this analysis indicated that the expected cost to remediate the site to a level supporting residential use was approximately \$25.8 million. Thus, PG&E's estimated cost was changed from \$11.9 million to \$25.8 million for the environmental portion of decommissioning, resulting in a total of approximately \$65 million for HPPP decommissioning.

ORA opposed this level of cleanup because of the costs it would impose on PG&E's ratepayers. SAEJ litigated this issue by presenting and cross-examining witnesses and briefing the issues, and the Commission adopted the higher, residential-level remediation cost estimate proposed by PG&E.

SAEJ also asserted that the cost estimate for environmental remediation was too low because of the potential need to clean up nearby bay sediments. In response, PG&E proposed that it seek funding from the Hazardous Substances Mechanism (HSM) for sediment cleanup, and the Commission provided in D.03-10-013 that PG&E could seek recovery of future sediment remediation costs related to HPPP through the HSM or a future general rate case.

We find that SAEJ made a substantial contribution to the Commission's decision on the cost of environmental remediation.

b) Rate Treatment

SAEJ also claims it made a substantial contribution to the Commission's decision on the appropriate rate treatment for PG&E's remediation costs. SAEJ argued for a one-way balancing account to ensure that PG&E performed a thorough cleanup, accurately estimated costs, used funds efficiently, and protected ratepayers.³

SAEJ asserted that PG&E's ratemaking proposal, which did not contain spending restrictions and allowed PG&E to retain unused funds, would create an incentive for PG&E to underspend on the cleanup and retain the funds for other projects.

While the Commission did not embrace SAEJ's specific proposal for a one-way balancing account, the Commission's decision to use the general rate case proceeding avoids any kind of cap on future reasonable expenses yet protects ratepayers if the initial estimate is an overestimation. SAEJ's raising of these issues was a substantial contribution and thus under § 1803(a) is sufficient to entitle SAEJ to compensation on these issues.

³ The accounts are so labeled because their usage requires a utility to refund to ratepayers funds reflected in rates but left unspent, but does not allow them to recover from ratepayers any expenditures in excess of the authorized accounts. *See* D.95-11-035, 1995 Cal. PUC LEXIS 978, at *138.

**c) California Environmental Quality Act
(CEQA) Review**

SAEJ requested that the Commission consider the potential environmental impact of the proposed decommissioning of the HPPP under CEQA. If the Commission opted not to perform CEQA review, SAEJ contended in the alternative that the Commission should find that its decision not to apply CEQA would “not determine or in any manner foreclose the determination of the appropriate cleanup standard or . . . the appropriate amount of funding from ratepayers or any other source required for cleanup”

The Commission rejected SAEJ’s claim that CEQA applied to the application. However, we explicitly stated that “[t]he Commission’s decision in this proceeding does not prescribe site remediation measures or dictate clean-up levels that will eventually be required for HPPP.” Thus, we agree with SAEJ that at a minimum, its advocacy assisted the Commission in determining the appropriate scope of its decision.

**D. The Reasonableness of Requested
Compensation**

SAEJ requests \$50,868.52 as follows:

Alan Ramo	2003	6.47 hours at \$353/hour	\$ 2,283.91
	2003	15.55 hours at \$176/hour	\$ 2,736.80
	2000	98.11 hours at \$287/hour	\$28,157.57
Robin Gilb	2003	15.50 hours at \$75/hour	\$ 1,162.50
Law Student	2003	20.00 hours at \$45/hour	\$ 900.00
	2000	173.48 hours at \$90/hour	\$15,613.20
Copying cost of CPUC files of rate case			\$ 14.54
TOTAL			\$50,868.52

The components of this request must constitute reasonable fees and costs when compared to market rates for similar services from comparably qualified persons.

1. Hourly Rates

a) Alan Ramo

SAEJ seeks an hourly rate of \$287 for the work of its lead counsel, Alan Ramo, in 2000. It seeks \$353 for work Ramo performed on the case in 2003. We previously awarded Ramo an hourly rate of \$220 in 1997⁴ and \$230 for work in 1998.⁵

SAEJ explains that Ramo has a current market rate in civil environmental cases of \$425, based upon his nearly 30 years of experience, most of it in environmental practice. SAEJ acknowledges that “One would expect a reasonable award after additional experience before the CPUC and normal rates of inflation in the legal field that would place the appropriate rate for compensation for the work in 2000 at a rate of \$250 per hour, and the work in 2003 at a rate of \$280 per hour.” However, asserts SAEJ,

this case was not a typical rate setting case. The case quickly focused upon the appropriate estimate of cleanup costs under applicable industry standards and environmental statutes and regulations outside the Public Utilities Code. Issues of environmental justice were central to PG&E’s adjustment of its proposed estimate as was the question of future community revitalization.

Therefore, asserts SAEJ, “an adjustment in hourly rate applicable to this subject matter would seem appropriate.”

⁴ D.99-10-020.

⁵ D.99-09-023.

We disagree that the work SAEJ performed was so complex or the case so unusual as to warrant a special, higher hourly rate for Ramo's work than it might otherwise receive. However, we also believe that SAEJ's suggested hourly rates applicable if this were a "typical rate setting case" (\$250 per hour for Ramo in 2000, and \$280 in 2003) are below market for a person of Ramo's skill and experience. Thus, we award Ramo his requested rates of \$287 in 2000 and \$353 in 2003 based on their comparability to other attorneys with Ramo's qualifications.

For example, we awarded Michel Florio \$300 an hour for 1999 work (D.03-05-029) and \$385 for work in 2002 (D.03-05-065). Florio was admitted to the California bar in 1978, while Ramo was admitted in 1974. Both attorneys have nearly 30 years of experience in their chosen specialization. Florio, however, has far more experience in Commission practice than Ramo, justifying a lower rate for Ramo than Florio.

Our finding is based on Ramo's education and experience. Ramo graduated from Stanford University with a BA degree in political science in 1971. He obtained his law degree in 1974 from Boalt Hall School of Law. He is currently a tenured Professor at Golden Gate University School of Law School in San Francisco, where he directs the Environmental Law and Justice Clinic and the LL.M. in Environmental Law program. For the past 20 years his practice has centered on environmental law.

For nine of those years Ramo was the legal director and General Counsel for Citizens For A Better Environment (CBE, now known as Communities for a Better Environment), a California non-profit organization specializing in pollution issues in the urban environment. During this period, he litigated on behalf of CBE in a number of environmental cases under a variety of state and

federal statutes. Prior to working with CBE, Ramo was in private practice for more than five years.

After working with CBE, Ramo began a practice focused exclusively on environmental matters. He has been the Director of the Golden Gate Environmental Law and Justice Clinic (ELJC) since December 1993 and a full time member of the faculty since July 1994. The ELJC is a public-interest legal clinic that provides free legal services and education on environmental justice issues to San Francisco Bay Area residents, community groups and public-interest organizations. Ramo also supervises student interns and staff lawyers representing clients in environmental matters.

Ramo has specific experience regarding site pollution issues. For example, he represented CBE in one of the first State Water Resources Control Board cases to address what should be the standard for aquifer remediation. *In the Matter of IBM* (State Water Resources Control Board Order WQ 88-15, December 15, 1988). The ELJC provided counseling to residents in Hunters Point concerned with San Francisco's only state superfund site, the Bay Area Drum Company. The clinic also represented a community group in the Alviso portion of San Jose who were concerned with the expansion of a recycling center into a hazardous waste site in the case of *Alviso Citizens in Action v. City of San Jose* (San Jose Super. Ct. 1997).

For many years Ramo represented a Southeast San Francisco community group and several environmental organizations in several cases concerned with toxic waste cleanup and contamination from the nearby Hunters Point shipyard, a federal superfund site. In each of those cases, settlements or consent decrees required additional remediation and pollution prevention measures to address historic waste. The most recent case resulted in a preliminary injunction and

contempt finding requiring pollution abatement. *SF BayKeeper v. Astoria Metals Corporation* ((N.D. Cal. October 12, 2000).

Ramo has been involved in numerous other pollution cases involving air and water quality. He successfully litigated against the Bay Area Air Quality Management District and the Metropolitan Transportation Commission in the enforcement of their air quality plans. *See Bayview Hunters Point Cmty. Advocates v. Metro. Transp. Comm'n* (N. D. Cal. 2002) 212 F. Supp. 2d 1156; *CBE v. Deukmejian* (N.D. Cal. 1990) 731 F. Supp. 1448; *CBE v. Deukmejian* (N.D. Cal. 1990) 746 F. Supp. 976; *CBE v. Deukmejian* (N.D. Cal. 1990) 31 ERC (BNA) 1545. He also represented CBE as an amicus in a California Supreme Court decision upholding the discretion of local districts to enforce toxic regulations. *Western Oil & Gas Ass'n v. Monterey Bay Unified Air Pollution Control Dist.* (1989) 49 Cal. 3d 408.

We find that SAEJ has justified a base rate of \$287 per hour for Ramo in 2000, and \$353 in 2003. While we do not award him an enhancement for his work on this case, he may seek such an enhancement for work on other matters and we will consider such a request on a case-by-case basis.

b) Robin Gilb

Robin Gilb, an attorney six years in practice, assisted Ramo on the case briefly in 2003. SAEJ requests a rate of \$150 per hour for Gilb's work in 2003. While SAEJ provides no detailed information on Gilb's experience other than the fact that she has 6 years in practice, the hourly rate requested is quite low compared to the other cases we have decided in the past year. While we awarded an attorney licensed since 1972 the same \$150 hourly rate for 1999 work in D.03-02-024, we stated that this rate was substantially below the claimed market rate for the attorney of \$250 per hour. In D.01-03-030, we adopted a \$180 hourly rate for 2000 for an attorney with 7 years of experience practicing law.

We find the \$150 hourly rate requested for Gilb is reasonable for work in 2003. However, in the future SAEJ should more carefully document its fee requests. It may seek a different rate for Gilb in future requests.

c) Law Students

SAEJ seeks a rate of \$90 per hour for all law student work. Law students worked on the case in 2000 and 2003. SAEJ claims that the current market rate for law students is \$100-110 per hour, although it does not document this claim.

SAEJ notes that the law students worked with Ramo as part of the Golden Gate University Environmental Law and Justice Clinic, which “serves an educational role for the University.” As the Clinic’s Director, Ramo supervises student clinicians and staff lawyers representing clients in environmental matters.

SAEJ does not address whether it is appropriate for us to compensate for time spent by law students who are also using a law clinic as part of their own educational enrichment or curriculum. This appears to be an issue the Commission has not previously addressed. Indeed, we have granted awards in excess of \$90 per hour for law students in past decisions. In D.03-04-050, we awarded \$125 per hour for work a second year law student performed in 2001. In D.03-01-075, we awarded \$85 per hour for “summer associates” (law students) who performed work in 2001. We awarded a \$70 hourly rate for interns performing work in 2001 in D.03-02-023. In view of the fact that we have no information about the law students, they receive at least some educational credit from the work, and the requested rate seems slightly too high for 2000, we will award a rate of \$80 per hour for work performed in 2000 and adopt the requested \$90 hourly rate for work performed in 2003.

**d) Hourly Rate for Intervenor Compensation
Request Drafting**

We note that SAEJ has halved its hourly rate for time spent on its compensation request. We ordinarily halve such time because we do not believe compensation requests ordinarily require the skill of an attorney to prepare. Thus, we will continue to halve the attorney time, but will give SAEJ the full hourly rate for time its law students spent on the request. Thus, we will award \$176/hour for Ramo's time spent on the request (half his awarded rate for 2003 of \$353), \$75 for Gilb's time (half her awarded rate of \$150), and \$90/hour for law student time (the full \$90 rate for law student work in 2003).

2. Hours Claimed

SAEJ documents its claimed hours by presenting a daily breakdown of the hours of its staff representatives, accompanied by a brief description of each activity. The hourly breakdown reasonably supports the claim for total hours. We find that SAEJ's contribution on all issues was substantial; however, we note gratefully that SAEJ broke down its efforts by issue, so that if we had needed to eliminate its work on certain issues from the award, this breakdown would have facilitated the process.

3. Costs

SAEJ requests \$14.54 in costs to copy a Commission file. This amount is reasonable and we award it.

III. Award

We award SAEJ \$50,033.72. This award reflects the fact that we do not halve the SAEJ law student rate for preparing the compensation request, but adopt a lower rate for law students in 2000. This amount is reflected in the following table (with bolded portions representing revisions to the request) and in Appendix A to this decision:

Name	Year	Hourly Fee Requested	Hourly Fee Adopted	Fee Requested	Fee Adopted
Alan Ramo	2003	6.47 hours at \$353/hour	Same	\$2,283.91	\$2,283.91
	2003	15.55 hours at \$176/hour	Same	\$2,736.80	\$2,736.80
	2000	98.11 hours at \$287/hour	Same	\$28,157.57	\$28,157.57
Robin Gilb	2003	15.50 hours at \$75/hour	Same	\$1,162.50	\$1,162.50
Law Students	2003	20.00 hours at \$45/hour	20.00 hours at \$90 /hour	\$900.00	\$1,800.00
	2000	173.48 hours at \$90/hour	173.48 hours at \$80 /hour	\$15,613.20	\$13,878.40
Copying cost of CPUC files of rate case				\$14.54	\$14.54
TOTAL				\$50,868.52	\$50,033.72

Consistent with previous Commission decisions, we will order that PG&E pay interest on the award amount (calculated at the three-month commercial paper rate), commencing the 75th day after SAEJ filed its compensation request and continuing until full payment of the award is made.

As in all intervenor compensation decisions, we put SAEJ on notice that the Commission staff may audit SAEJ's records related to this award. Thus,

SAEJ must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. SAEJ's records must identify specific issues for which it requests compensation, the actual time spent by each employee, the applicable hourly rate, fees paid to consultants, and any other costs for which compensation may be claimed.

IV. Waiver of Comment Period

Pursuant to Rule 77.7(f)(6) of the Commission's Rules of Practice and Procedure, the otherwise applicable 30-day period for public review and comment may be waived because this is an intervenor compensation decision.

V. Assignment of Proceeding

Geoffrey F. Brown is the Assigned Commissioner and Bertram D. Patrick is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. SAEJ has made a timely request for compensation for its contribution to D.03-10-013.
2. SAEJ has requested hourly rates for Alan Ramo and Robin Gilb that are consistent with rates we have approved in prior Commission decisions.
3. SAEJ has not demonstrated entitlement to an increase in or adder to Ramo's hourly rates to reflect the difficulty or complexity of the proceeding.
4. SAEJ's requested hourly rate for law student work in 2000 is higher than the Commission has awarded in the past.
5. SAEJ's cost request is reasonable.

Conclusions of Law

1. SAEJ has fulfilled the requirements of §§ 1801-12, which govern awards of intervenor compensation.
2. SAEJ should be awarded \$50,033.72 for its contribution to D.03-10-013.

3. This order should be effective today so that SAEJ may be compensated without unnecessary delay.

O R D E R

IT IS ORDERED that:

1. The Southeast Alliance for Environmental Justice (SAEJ) is awarded \$50,033.72 in compensation for its substantial contribution to Decision 03-10-013.

2. Pacific Gas and Electric Company (PG&E) shall pay the award within 30 days of the effective date of this order. PG&E shall also pay interest on the award at the rate earned on prime, three-month commercial paper, as reported in Federal Reserve Statistical Release H.15, with interest, beginning February 9, 2004, the 75th day after SAEJ filed its compensation request and continuing until full payment of the award is made.

3. This proceeding is closed.

This order is effective today.

Dated April 1, 2004, at San Francisco, California.

MICHAEL R. PEEVEY
President

CARL W. WOOD
LORETTA M. LYNCH
GEOFFREY F. BROWN
SUSAN P. KENNEDY
Commissioners

Compensation Decision Summary Information

Compensation Decision(s):	D0404012
Contribution Decision(s):	D0310013
Proceeding(s):	A9909006
Author:	ALJ Patrick
Payer(s):	Pacific Gas and Electric Company

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Reason Change/Disallowance
Southeast Alliance for Environmental Justice	November 24, 2003	\$50,868.52	\$50,033.72	No need to halve hourly rate of students preparing compensation request

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Alan	Ramo	Attorney	Southeast Alliance for Environmental Justice	\$287	2000	\$287
Alan	Ramo	Attorney	Southeast Alliance for Environmental Justice	\$353	2003	\$353
Robin	Gilb	Attorney	Southeast Alliance for Environmental Justice	\$150	2003	\$150
	Law students	Law students	Southeast Alliance for Environmental Justice	\$90	2000	\$80
	Law students	Law students	Southeast Alliance for Environmental Justice	\$90	2003	\$90